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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, SAL CATALDO,  
JULIAN SANTIAGO, and SUSAN LYNN  
HARVEY individually and on behalf of all  
other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688-RS

**DECLARATION OF RYAN MCGEE IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
PORTIONS OF MOTION FOR CLASS  
CERTIFICATION**

Judge: Hon. Richard Seeborg  
Courtroom 3 – 17th Floor  
Date: October 5, 2023  
Time: 1:30 p.m.

**DECLARATION OF RYAN MCGEE**

I, Ryan McGee, declare as follows.

1. I am an associate with the law firm of Morgan and Morgan, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of Florida and admitted *pro hac vice* for this case. Dkt. 13. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Pursuant to Civil Local Rule 79-5, I submit this Declaration in support of Plaintiffs' administrative motion to seal portions of their motion for class certification. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5.

3. Plaintiffs respectfully request that the Court seal:

- a. Portions of paragraphs 149, 152, 182, 191, 192, 244, and 246 of the March 22, 2023 Expert Report of Jonathan Hochman ("Hochman Report"), which contain information related to the Plaintiffs, including identifiers.
- b. The entirety of Appendices A, B.1, B.2, C, D, and K of the Hochman Report, which contain information related to the Plaintiffs, including identifiers.

4. The information requested to be sealed is being designated by Plaintiffs as "Confidential" pursuant to the parties' Stipulated Protective Order (Dkt. 70).

5. Specifically, the portions sought to be sealed associate one of the named Plaintiffs with various identifiers. *E.g.*, Hochman Report ¶ 192 (discussing a named Plaintiff's phone number, zip code, and device information). In other cases, Plaintiffs seek to seal spreadsheets containing and analyzing records produced from Google's logs, which Plaintiffs expect Google will in any event seek to seal.

6. Similar requests to seal were granted in *Calhoun v. Google LLC*, No. 4:20-cv-05146-YGR-SVK (N.D. Cal.), Dkt. 198 (sealing *Calhoun* plaintiffs' web browsing history and information), and *Brown v. Google LLC*, No. 4:20-cv-03664-YGR (N.D. Cal.), Dkt. 804 (sealing *Brown* plaintiffs' web browsing history and information).

